

Privacy Policy

We respect your privacy and place special emphasis on the security of your personal data. For that reason, this Privacy Policy aims to transparently and clearly inform you about the collection, use, nature, and scope of the processing of your personal data by **S Blue d.o.o.**, Antona Aškerca 42/32, Company ID: 21838225, acting as the controller of your personal data (hereinafter referred to as “S Blue”, “we” or “Tag4all”), which operates under the **Tag4all** brand. For the avoidance of doubt, any legal or public action under the Tag4all brand/platform is formally conducted by S Blue.

This document contains information about all the data we collect about you in the course of various interactions with us, especially the data we collect when you access our website www.tag4all.rs, when you register and create a profile, or when you decide to purchase our products online as a guest.

Personal data refers to any information that directly or indirectly relates or may relate to you as a natural person. As the legal basis for data protection and conditions for processing your personal data, we apply the Law on Personal Data Protection ("Official Gazette of the RS", no. 87/2018, hereinafter referred to as “the Law”).

In the event our website contains links to other websites, we kindly ask you to familiarize yourself with the privacy policies of those websites and the way they process your data. Please note that **S Blue** has no control over the content of third-party websites and therefore cannot be held responsible for the protection of your privacy when visiting those sites.

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1. How do we collect your personal data and on what legal basis?

All the information we collect comes directly from you, when you order certain products or services and fill out the appropriate form.

All your personal information is treated as strictly confidential and is stored appropriately by S Blue and/or our trusted partners.

In accordance with the applicable legislation governing the protection of personal data, we may process your personal data on the following legal grounds:

- When the processing of your personal data is necessary for entering into and fulfilling a contract you are party to;
- When the processing of your personal data is necessary to fulfill certain legal obligations (this especially includes data we must retain for tax purposes);
- When we have a legitimate interest in processing your data, unless your interests or fundamental rights and freedoms override those interests;
- When you have given us your consent for a specific purpose of data processing, and you have the right to withdraw that consent at any time.

Providing only the personal data necessary to fulfill legal obligations is mandatory.

Providing personal data under all other legal grounds is voluntary, but please note that if you withhold such data, we may not be able to provide certain services (such as home delivery or sending newsletters via email).

Please note that all of the legal bases listed above are applied depending on the purpose for which we are collecting your data, and we will inform you of this in each specific case.

For more on the purpose and type of data we collect, see the section "What personal data do we collect from you?"

2. What Data Do We Collect from You?

S Blue collects various categories of personal data, depending on the specific requests of users/customers.

2.1. Purchase/Order on the S Blue Website/Application

When you make a purchase on S Blue, via the website or mobile application, you may be asked to provide certain personal data necessary for concluding a distance sales contract, creating an order, or fulfilling obligations from the sales contract—such as delivery, payment, and receipt of goods.

When using our online purchasing services through the website or mobile application, in addition to data like your full name, phone number, and address (city, street and number, postal code, apartment number, and floor), we also require your email address to confirm the purchase and send you the order confirmation.

If you make an online payment, to ensure a secure purchase, we collect data about the completed transaction.

You can complete an online purchase even if you're not registered on the tagonline.rs website, i.e., as a guest.

Purchases can also be made by calling our contact center. In this case, we collect your full name, phone number, address (city, street and number, postal code, apartment number, and floor), email address, and your payment card number and transaction details (if you choose this payment method).

The data collected in this manner is used exclusively for concluding and executing the distance sales contract, which includes managing and tracking orders, communicating with you, and handling complaints or reminders.

To ensure that the products you purchase from us are delivered to the correct address, we share your data with our external partners to provide appropriate services (e.g., your name, delivery address). For more information about our partners, see the section "Who Has Access to Your Data?"

2.2. Complaints

S Blue is obligated under the Consumer Protection Act to provide customers with the opportunity to file complaints about purchased products.

In such cases, when filing a complaint, we may collect your full name, phone number, email address, and/or home address if product shipping or on-site service is required.

The data collected in this way is used solely for resolving and responding to your complaints.

In the event of terminating a concluded sales contract, we may process your ID card number in accordance with tax regulations, or your bank account number if a refund is to be issued in this manner.

2.3. Creating a User Account on the S Blue Website/Application

When you decide to register on our website or create your personalized profile, we collect the following data:

- **Mandatory data:**
 - Full name
 - Email address
 - Password
 - Gender
 - Date and year of birth
 - Phone number
- **Additional data:**
 - City/place of residence
 - Street, number, floor, and apartment number

If, as a registered user, you decide to purchase any of our products available on our website, in accordance with our Terms of Service, to execute the transaction and deliver the goods, we may require additional data as specified in section 2.1 of this Privacy Policy.

Please note that we do not collect special categories of data, such as information related to your racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, nor do we process genetic data, biometric data, health-related data, or data concerning your sex life or sexual orientation.

Since the profile is created solely based on your consent, you can withdraw your consent at any time by deleting your profile, after which we will delete all data we hold about you.

2.4. Contacting S Blue – Various Types of Inquiries (Contact via Email, Phone, Social Media, or Website)

Depending on how you contacted us and the type of inquiry, we may collect your full name, phone number, email address, and other information you shared with us related to your inquiry.

You can also contact us when you wish to make a purchase via phone. In this case, we process your data as specified in section 2.1 of this Privacy Policy.

If you have accepted the Privacy Policy, S Blue reserves the right, based on legitimate interest, to occasionally send you surveys via email to improve our services and your user experience.

2.5. Marketing Purposes – Subscription for Contact and Receiving Notifications about Current Offers and Promotions – Newsletters and Campaigns via Phone Number

There are several ways to subscribe to promotional offers from S Blue:

When providing this information, you may voluntarily accept our entire Privacy Policy, in which case you consent to us collecting your interactions (complaints, purchases, calls to the contact center, etc.) with S Blue in order to improve the customer experience and send personalized offers.

A. If you would like us to contact you and send you updates about current offers and promotions, you can submit the following information at any time via the form at the bottom of our website:

- Your **phone number** – for notifications and offers via SMS, mobile apps (Viber, WhatsApp), and our contact center.
- Your **email address** – for notifications and offers via newsletter.

B. When registering or creating a profile on our website/mobile app, S Blue will also offer the option to subscribe to receive promotional updates by email, SMS, mobile apps (Viber, WhatsApp), or through our contact center. Alongside the data you provide during registration, you can also agree to receive marketing communications. These fields are optional, so it's possible to create a profile without subscribing to promotional communications.

If you did not subscribe during registration, you can always update your preferences in the “Notifications” section of your profile and opt in to receive communications via email, SMS, Viber, WhatsApp, or phone.

C. If you want to receive notifications about special offers (e.g., Black Friday) or participate in a prize game, S Blue may offer temporary subscription forms. Depending on the form, you may provide your data for that specific purpose only—unless there is also an option to subscribe to ongoing communications via email, SMS, mobile apps, or our contact center. In this case, your data will be retained solely for the specified purpose and deleted once the purpose is fulfilled or if you withdraw your consent beforehand.

D. If you initiate interaction with us via the S Blue live chat, there is also an option to subscribe to the newsletter. This is optional, and you can still interact with the S Blue team without subscribing.

E. As part of our comprehensive digital transformation, S Blue will begin using Salesforce, a new platform for communication via newsletters and Viber/SMS, to ensure our offers are as relevant and tailored to your needs as possible.

You may withdraw your consent to receive promotional communications at any time, in which case we will stop sending them. Withdrawal of consent does not affect the legality of the data processing carried out before the withdrawal.

Regardless of how you subscribed, you can withdraw your consent using the unsubscribe option found at the bottom of every email or by sending a message via SMS, mobile apps (Viber, WhatsApp), or during a call with our contact center if you gave your consent for that channel.

If you have a registered profile on our website, you can also manage your preferences in the “Notifications” section of your profile by unchecking the option for promotional communication. You can update your subscription status at any time, and we will act accordingly.

Please note that for sending newsletters, messages via mobile apps, SMS, or calls from the contact center, we engage external partners to carry out these services, which may involve the transfer of your data to such parties. For more information about our partners, see the section “Who Has Access to Your Data?”

2.6. Promotional Activities, Contests, Sponsorships

For the purposes of participating in contests, sponsorships, or conducting promotional activities, we collect data in accordance with the rules of each individual activity.

To register participants, we require your full name, and depending on the specific rules of the contest, your date of birth and home address. If you win a prize whose value exceeds the amount specified by tax regulations, we will also need your unique citizen identification number (JMBG). When collecting this data, we will inform you, in each specific case, about the type and purpose of data processing, as well as your rights.

Since, by applying to a contest, giveaway, or similar event, you agree to the rules established by the organizer, the mentioned data is collected exclusively based on your consent.

All data collected for the purposes of such events is stored until the event is concluded, after which the data of all participants is deleted—except for the data of the winners that must be retained in accordance with applicable legal obligations.

2.7. Profiling

In cases where we send or display personalized messages or content, we may use processes

referred to as “profiling” (i.e., any form of automated processing of personal data involving the use of collected personal data to evaluate certain personal aspects related to an individual, in particular to analyze or predict aspects related to that individual’s preferences, interests, financial status, behavior, location, reliability, or movements).

Based on our analysis, we send or display notifications and/or content that is tailored specifically to your interests and needs.

We process this data solely based on your consent.

2.8. Website Visits

With your consent, we record your behavior as a user of our website www.tag4all.rs, mobile applications, and newsletters. User behavior analysis primarily includes data on the sections you visit and the links you use. This enables us to create personalized user profiles with your personal data and/or email address to provide tailored advertising offers via newsletters, on-site ads, and printed materials, enhancing our offerings.

S Blue processes your data when you visit our website, use applications, and other platforms. Various data is exchanged between your device and our server, which may include personal data. This data is used, among other purposes, to optimize our website or display ads in your device's browser.

When you visit our website, your browser automatically and without your intervention sends the following data to our server:

- IP address of the device accessing the internet,
- Date and time of access,
- Name and URL of the retrieved file,
- Website/application from which access is made (referrer URL),
- Browser used and, if applicable, the operating system of your internet-enabled computer, as well as the name of your provider.

This data is temporarily stored in a log file for the following purposes:

- Ensuring a smooth connection setup,
- Ensuring comfortable use of our website/application,
- Evaluating system security and stability.

If you have enabled geolocation in your browser, operating system, or other device settings, or have given your consent, we use this function to offer you individualized services based on your current location (e.g., locating the nearest store). We process location data solely for this purpose.

The legal basis for processing the IP address is our legitimate interest, derived from the aforementioned purposes, as it is a technical requirement for the website's functionality. We do not share this data with third parties. The data is stored temporarily during your visit and is automatically deleted afterward. Geolocation data is deleted once you leave our website.

2.9. Use of Cookies

We use cookies on our website. Cookies are small files stored on your device (laptop, tablet, smartphone, etc.) when you visit our website. Cookies do not contain viruses, trojans, or other malicious software. They store information related to the specific device used. However, this does not mean we are aware of your identity.

We use cookies to make your visit to our website more pleasant. We use session cookies to recognize that you have already visited certain parts of our site or are logged into your user account. These are automatically deleted after you leave our website. Additionally, we use temporary cookies stored on your device for a specified period. When you revisit our website, it automatically recognizes that you have visited before and remembers your settings, so you don't have to re-enter them.

We also use cookies to statistically record the use of our website to optimize our offerings and display information tailored to your interests. These cookies allow us to recognize you automatically upon your return to our website. These cookies are automatically deleted after five years, but you can manually delete them at any time.

Most browsers automatically accept cookies. However, you can configure your browser to prevent cookies from being stored on your computer or to always display a prompt before a new cookie is created. Completely disabling cookies may mean you cannot use all features of our website.

For more information on the use of cookies and how we collect them, please refer to our [Cookie Policy](#).

2.10. Google Analytics

To tailor the design and continuously improve our website, we use Google Analytics, a web analytics service provided by Google Inc. ("Google"). In this context, pseudonymized user profiles are created and cookies are used. These cookies generate the following information about your use of the website:

- browser type/version,
- operating system used,
- referrer URL (previously visited page),
- hostname of the accessing computer (IP address),
- time of the server request.

The information is used to evaluate the use of our website, to compile reports on website activity, and to provide other services related to website and internet usage. The data is processed for market research purposes and to optimize the website. IP addresses are anonymized so that individual identification is not possible (so-called IP masking). Under no circumstances will your IP address be merged with other Google data.

For more information on data protection related to Google Analytics, please visit the Google Analytics website.

2.11. Social Media

Data on social media platforms is largely processed by the platform operators themselves, and S Blue has limited control over this processing.

Detailed information on how social media platforms process personal data and on your rights and options to object can be found in their respective privacy policies:

- Facebook
- YouTube
- Instagram

Data collected via social media is processed for the purpose of informing consumers about current promotions and offers, as well as to foster interaction and strengthen engagement with our followers.

Any data you share via social media based on your consent—such as comments, videos, images, or likes—is published by the platform operator. S Blue does not share this data with third parties and reserves the right to remove unlawful content, hate speech, explicit material, and content constituting a criminal offense.

With the social media platform operator, we have a partially joint responsibility under Article 45 of the Law (Joint Controllershship):

Regarding web tracking methods made available by the platform operator, the operator and S Blue are jointly responsible. Web tracking may occur even if you are not logged into or registered on the social media platform. As previously mentioned, we unfortunately have only limited influence over the tracking methods used by the platform operator—for example, we cannot disable them.

The legal basis for these tracking methods is our legitimate interest in optimizing the social media platform and our specific fan page.

3. Who Has Access to Your Data?

At S Blue, protecting your personal data is of utmost importance. We take special care to ensure that your personal information is not disclosed to unauthorized parties. Within our company, only those departments and employees who require access to your data to fulfill the purpose for which the data was collected—and whose job descriptions include processing personal data—will have such access.

In addition to our employees, and for the purpose of providing certain services, we may share your data with third parties—our partners who provide services on behalf of S Blue (e.g., courier services, complaint resolution departments, IT partners maintaining our website/mobile app).

In all such cases, our relationship with these external partners, including the manner of data protection and handling, is regulated through contracts in accordance with applicable data protection laws.

Most personal data processing is carried out by partners operating within the Republic of Serbia. However, some services may be provided by partners based in the EU or third

countries. In such cases, the transfer of personal data is carried out based on an adequacy decision for EU/EEA countries in accordance with Article 63 of the Law or based on appropriate safeguards under Article 65 of the Law (Standard Contractual Clauses issued by the Commissioner).

4. How Long Do We Store Your Data?

We retain your personal data only as long as necessary to fulfill the purposes outlined above. During this period, we take into account legal obligations related to the retention of personal data.

In the case of account creation or data collection based on consent, your personal data will be processed until the user profile is deleted or consent is withdrawn. Withdrawal of consent does not affect the lawfulness of data processing carried out before the withdrawal.

Data collected based on consent will also be deleted prior to consent withdrawal if the intended purpose for data collection has been fulfilled (e.g., data from participants in prize contests).

When the legal basis for processing is the conclusion or execution of a contract, we retain data related to purchases and customers for as long as required under tax laws and laws regulating sales contracts (e.g., data related to complaints is retained in accordance with the Consumer Protection Law).

After the expiration of the applicable retention period or upon consent withdrawal (for consent-based data), all customer data will be anonymized or deleted/destroyed.

In the case of purchase data, customers also have the option to anonymize their own data after the legally prescribed period has passed. Anonymization is performed through a link sent to the customer via a generic email upon successful order placement.

5. Data Concerning Minors

S Blue does not intentionally process personal data of children under the age of 16.

To prevent the sale of products to individuals under the age of 16, S Blue requires users to provide their month and year of birth during the purchase process.

Individuals under the age of 16 are not permitted to create personalized profiles on our website.

We recommend that adults supervise minors in their care while they browse the internet, especially when it involves sharing personal data.

6. Security Measures

To ensure the protection of personal data, S Blue has adopted a comprehensive set of rules governing the processing and safeguarding of personal information.

Various mechanisms have been implemented, such as mandatory training for all employees on handling confidential and personal data, restricted access to personal data granted only to authorized personnel, and strong password policies. In addition, S Blue has appointed a Data Protection Officer who supports the data protection process, ensures the security of personal data, and monitors compliance with the Law.

Furthermore, S Blue enables its users to anonymize their data, download all personal data stored on the website (account details, orders, comments, wish lists, etc.), and enforces a strong password policy for personal profiles (minimum of 6 characters, including uppercase and lowercase letters, numbers, and punctuation marks).

S Blue continuously monitors and upgrades its security measures as needed, in order to prevent unauthorized access, data loss, or destruction of personal data.

7. Your Rights as a Data Subject

At any time, you may contact us to exercise the following rights:

- To request access to your personal data, to inquire about the purposes for which it is being processed, and to obtain information on the categories of personal data we store, the third parties or categories of third parties with whom your data is shared, and the retention period of your data.
- To request the correction of inaccurate, incorrectly entered, or outdated data.
- To request the deletion of your personal data when processing is based on your consent or legitimate interest, or when the data is no longer necessary for the purpose it was collected for.
- To request restriction of processing if you contest the accuracy of the data for a period enabling verification, if you believe the processing is unlawful but do not wish the data to be erased, if you have submitted an objection, or if you believe that S Blue no longer needs the data.
- To object to the way we process your data, even if the processing complies with the Law.
- To lodge a complaint with the Commissioner for Information of Public Importance and Personal Data Protection in accordance with the Law.

For any additional questions or requests regarding the processing of personal data, you may contact our Data Protection Officer at:

office@s-blue.us

8. Entry into Force and Changes to the Privacy Policy

This Privacy Policy enters into force on **May 6, 2025**.

The Privacy Policy may be amended or supplemented as needed, due to process changes at S Blue, legal updates, or requests from the competent authority (the Commissioner for Information of Public Importance and Personal Data Protection).

We recommend that users regularly review the Privacy Policy updates on our website.